

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

SEP 1 5 2010

OFFICE OF AIR, WASTE AND TOXICS

Mr. Peter Jewitt Farallon Consulting, LLC 975 5th Avenue Northwest Issaquah, Washington 98027

Mr. Gil Leon Earle M. Jorgensen Company 10650 South Alameda Lynwood, California 90262

Re: Request for Extension – Submittal of Second Draft Engineering Evaluation/Cost Analysis; Jorgensen Forge Facility, Seattle, Washington Administrative Order on Consent, U.S. EPA Docket No. CERCLA 10-2003-0111

Dear Mr. Jewitt and Mr. Leon:

The U.S. Environmental Protection Agency Region 10 (EPA) received an email on September 9, 2010 from your project manager, Amy Essig Desai, requesting a second extension of the due date for the revised Draft Engineering Evaluation/Cost Analysis (EE/CA) for the Jorgensen Forge Facility. The email indicates that you are not comfortable revising the EE/CA until you have seen 30% engineering drawings for the proposed remedy at Boeing Plant 2 with "enough buy off from EPA that it would closely represent what EPA would take to public comment." The current due date for submitting your revised EE/CA to EPA is September 20, 2010. The email requests an additional sixweek extension until November 1, 2010, and requests a meeting be held between EPA, Jorgensen, and Boeing in order to develop a revised project schedule.

As you are aware, the project schedule allows very little time beyond September 20th for submittal of the EE/CA if construction is to begin in 2012. Your proposed submittal date may negatively impact the construction start date. EPA is committed to achieving the 2012 construction season, and is concerned that an extension will reduce the likelihood.

EPA is also concerned that Jorgensen appears to expect EPA to "buy off" on a proposed remedy prior to receipt of the alternatives analyses for both the Jorgensen and Boeing Plant 2 cleanups. As you are aware, EPA must consult with tribal governments and the Washington State Department of Ecology, and intends to consult with other stakeholders, prior to sending a proposed remedy to public comment. While we understand your desire for some certainty prior to submitting the EE/CA, EPA provided



direction and guidance in the form of comments on your EE/CA as well as Boeing Plant 2's alternatives analysis, and coordinated these comments to avoid inconsistencies.

In accordance with comments already provided to you, the EE/CA must evaluate several reasonable alternatives for cleanup of the conditions that exist at the Jorgensen Forge site. Boeing must do the same for the Plant 2 cleanup. While the selected remedies must be consistent to a significant degree, and fully integrated within the transition zone, the alternatives in the EE/CA are broad enough to support EPA remedy selection for Jorgensen regardless of what is ultimately selected for Boeing Plant 2.

We have had several technical meetings to discuss EPA's comments on Jorgensen's EE/CA, and believe we are in agreement about what alternatives will be evaluated. EPA does not expect there will be major inconsistencies in conceptual approach, and minor inconsistencies can be coordinated during final design. We do not see any advantage in proceeding serially rather than in parallel with the Boeing Plant 2 and Jorgensen alternatives analyses.

EPA is therefore granting only a partial extension to the submittal date, to allow a reasonable period of time to complete a high-quality revised EE/CA for the Jorgensen Forge site. The revised EE/CA should be coordinated to the degree possible with Boeing given the time constraints. Jorgensen Forge's revised draft Engineering Evaluation/Cost Analysis must be submitted to EPA by October 12, 2010.

Should you have questions or comments, please contact me by phone at 206-553-8506 or by email at brown.christy@epa.gov.

Sincerely,

Christy Brown

Project Coordinator

Christy Brown

Office of Air, Waste and Toxics

Cc: Glen

Glen St. Amant, Muckleshoot Tribe Allison O'Sullivan, Suguamish Tribe

Marla Steinhoff, NOAA

John Keeling, Ecology - NWRO

Brad Helland, Ecology - NWRO

Thea Levkovitz, DRCC

Amy Essig Desai, Farallon Consulting

David Templeton, Anchor Environmental

Ryan Barth, Anchor Environmental

John S. Wakeman, USACE

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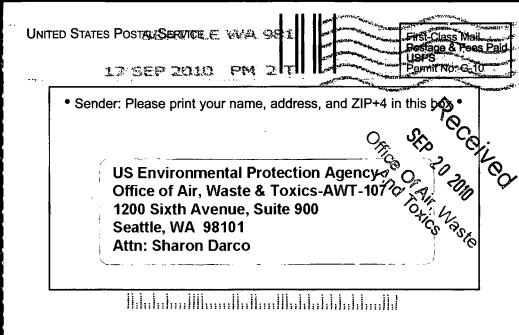
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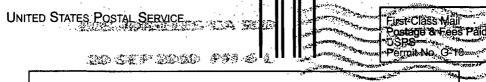
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Region 10 Routing and Concurrence

Author:	Christy Brown	Date:	9-14-10
Addressee:	Peter Jewitt, Farallon Consulting; Gil Leon, Earle M. Jorgensen Company		
Subject:	Schedule Extension for Draft EE/CA		
File Location/Name:	Superfund Records Center; LDWG 4.1/Jorgensen Forge		

PROGRAM ADMIN REVIEW:

Name:	BROWN	2RDINE	POLICY FILE YES/NO	RCRAINFO YES/NO
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cc(s) (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

Glen St. Amant	Marla Steinhoff	Brad Helland
Senior Sediment Specialist	NOAA Assessment and Restoration	Department of Ecology, NWRO
Muckleshoot Indian Tribe	7600 Sand Point Way NE, Building 1	3190 - 160 th Ave, SE
39015 172 nd Ave SE	(DARP)	Bellevue, WA 98008-5452
Auburn, WA 98092	Seattle, WA 98155	
Allison O'Sullivan	John Keeling	SEE ATTACHED
Suquamish Tribe	Department of Ecology, NWRO	
P.O. Box 498	3190 – 160 th Ave, SE	
Suquamish, WA 98392	Bellevue, WA 98008-5452	

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Charles Ordine, ORC-158	Suzanne Skadowski, ETPA-081	2/20/12
Allison Hiltner, ECL-111	Erika Hoffman, WOO	9./33/10
Kris Flint, ECL-111	Shawn Blocker, AWT-121	
Piper Peterson-Lee, ECL-111	Christy Brown, AWT-121	T'

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CCs, continued: Thea Levkovitz DRCC 5410 1st Ave NE Seattle, WA 98105

Amy Essig Desai Farallon Consulting 975 5th Avenue Northwest Issaquah, WA 98027

David Templeton Anchor Environmental 1423 3rd Avenue, Suite 300 Seattle, WA 98101

Ryan Barth Anchor Environmental 1423 3rd Avenue, Suite 300 Seattle, WA 98101

John S. Wakeman US Army Corps of Engineers, Seattle District 4735 E Marginal Way S Seattle, WA 98134